

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

MELISSA THRASHER-LYON,)	
on behalf of herself and a class)	
of others similarly situated,)	
)	
Plaintiffs,)	No. 11 Civ. 4473 (RC)
)	
v.)	
)	
ILLINOIS FARMERS INSURANCE)	
COMPANY and CCS COMMERCIAL)	Jury Trial Demanded
LLC d/b/a/ CREDIT COLLECTION)	
SERVICES COMMERCIAL,)	
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE AN OVERSIZED BRIEF, *INSTANTER***

Now comes Plaintiff's Counsel, Loevy & Loevy, and respectfully requests leave to file a single oversized brief, *instante*, in opposition to the separate motions to dismiss of Defendants CCS Commercial LLC ("CCS") and Illinois Farmers Insurance Company ("Farmers"), stating in support as follows:

1. On August 25, 2011, Defendants CCS and Farmers each filed separate motions to dismiss which collectively seek the dismissal of all four counts in the Complaint. CCS filed a Supplement to its Motion to Dismiss raising additional grounds for dismissal on August 31, 2011.

2. Plaintiff's response to Defendants' motions to dismiss is due today. Plaintiff attaches her single brief in response to both motions to dismiss as Exhibit A.¹

3. Given the similarities and overlap between the issues raised in the Defendants'

¹ Plaintiff recognizes that the response brief attached as Exhibit A does not contain a table of contents or authorities. Plaintiff will file a copy of the response brief containing a table of contents and authorities, and provide the Court and opposing counsel with a courtesy copy of same, on Monday, September 12, 2011.

motions, Plaintiff's counsel believes that the most effective and concise way of responding to Defendants' separate motions is in one brief.

4. The brief is 21 pages, far less than the total pages that Plaintiff would be allowed if she filed two separate briefs. Nevertheless, the brief exceeds 15 pages, requiring leave of Court.

5. Plaintiff's Counsel acknowledges that this is a substantial brief; however, Counsel respectfully requests the Court's indulgence due to the importance of the issues and the dispositive nature of the motions. Counsel has tried to concisely provide all relevant information in order to aid in the Court's consideration of the issues.

WHEREFORE, Plaintiff respectfully requests that this Court grant leave to file the oversized brief, attached as Exhibit A, *instanter*.

Respectfully submitted,

/s/ Anand Swaminathan

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CERTIFICATE OF SERVICE

I, Anand Swaminathan, an attorney, certify that on September 9, 2011, I caused the foregoing Motion to be served on all counsel of record via CM/ECF electronic filing.

/s/ Anand Swaminathan